



Timothy Brandenburg  
Drilling Manager

Union Oil Company of California  
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**SCANNED**  
KN 1/26 ANK  
2339.48.002

January 19, 2012

Director, Office of Compliance and Enforcement  
Attention: Data Entry Staff  
United States Environmental Protection Agency, Region 10  
1200 Sixth Avenue, OCE-133  
Seattle, WA 98101

RECEIVED  
JAN 23 2012  
DEC  
Division of Water Quality  
Wastewater Discharge Program

RETURN RECEIPT REQUESTED - CERTIFIED MAIL 91 7011 2970 0001 9276 5632

Re: NPDES Permit No. AKG-31-5002  
Trading Bay Production Facility December 2011 Discharge Monitoring Reports (DMR)

To whom it may concern:

Union Oil Company of California ("Union") operates the Trading Bay Production Facility that discharges regulated effluents in Cook Inlet, Alaska under NPDES Permit No. AKG-31-5002. Pursuant to condition VI.B of the Permit, Union Oil Company of California is hereby submitting the December 2011 NPDES Discharge Monitoring Reports (DMRs) for the Trading Bay Production Facility.

Please take note that Union is using the forms provided by EPA with corrections to accommodate the reporting that is required by the permit. The corrections were approved by your Data Steward in an e-mail to Marilu Moreno-Jones dated September 3, 2010. Union plans to use this same format for future DMR submittals.

Consistent with the authorization in your e-mail of September 16, 2010, this letter certifies all of the 5 pages of DMRs for Trading Bay Production Facility attached to this letter.

If you have any questions, please direct them to Mr. Rodney Bailey at (432) 687-7123 or via e-mail at [bailerg@chevron.com](mailto:bailerg@chevron.com).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Best regards,

  
Timothy Brandenburg

cc: ADEC / Certified Mail 91 7011 2970 0001 9276 5649

Director, Office of Compliance and Enforcement  
US Environmental Protection Agency  
January 19, 2012  
Page 2

bcc: Susan Saupe, CIRCAC  
Facility Operations Supervisors  
HES 2011 NPDES DMR – TBP File  
HES 2011 NPDES DMR – REGIONAL File

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)**

Form Approved  
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: UNION OIL COMPANY OF CALIFORNIA (UNOCAL)  
ADDRESS: P.O. BOX 196247  
ANCHORAGE, AK 99519-6247  
FACILITY: TRADING BAY TREATMENT FACILITY  
LOCATION: COOK INLET, Alaska  
ATTN: JOHN ZAGER, GENERAL MANAGER

AKG315002	015-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 99519  
MINOR  
(SUBR 02)  
PRODUCED WATER AND SAND  
External Outfall

MONITORING PERIOD			
MM/DD/YYYY		MM/DD/YYYY	
12/01/2011	FROM	12/31/2011	TO

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	*****	*****	*****	NA	*****	NA	NA	NA	NA	NA
00400 V 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Monthly	GRAB
pH	SAMPLE MEASUREMENT	*****	*****	*****	7.0	*****	7.9	SU	0	Weekly	GRAB
00400 W 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
03582 T 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	23	28	mg/L	0	Weekly	COMP24
03582 U 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	COMP24
Flow, in conduit or thru treatment plant*	SAMPLE MEASUREMENT	3.667775	3.790836	mgd	*****	*****	*****	*****	NA	Monthly	ESTIMA
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. MO AVG	Req. Mon. DAILY MX	mgd	*****	*****	*****	*****		Monthly	ESTIMA
Produced water, free oil	SAMPLE MEASUREMENT	*****	NA	NA	*****	*****	*****	*****	NA	NA	NA
79834 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	Req. Mon. MO TOTAL	occur/mo	*****	*****	*****	*****		Daily	VISUAL

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER  John Zager, General Manager Mid Continent/Alaska Business Unit TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE		DATE
		(907) 276-7600		01/19/2012
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA Code	NUMBER

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NO DISCHARGE OF PRODUCED SAND IS ALLOWED  
T = GRAB SAMPLE  
U = COMPOSIT SAMPLE  
V = DISCHARGE < 1 MGD (PREVIOUS MONTHS AVG RATE)  
W = DISCHARGE > 1 MGD (PREVIOUS MONTHS AVG RATE)

\*Flow rates include deck drainage from Dolly Varden, Grayling, King Salmon, Monopod, and Steelhead Platforms.

Estimated workover fluid flow rate: 0.025284 mgd

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FROM 12/01/2011	TO 12/31/2011

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Nitrogen, ammonia total (as N) 00610 1 0 Effluent Gross	SAMPLE MEASUREMENT	*****	*****	*****	*****	No Sample	No Sample	mg/L	NA	Quarterly	GRAB
	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Quarterly	GRAB
Silver total recoverable 01079 1 0 Effluent Gross	SAMPLE MEASUREMENT	*****	*****	*****	*****	5	5	ug/L	0	Monthly	GRAB
	PERMIT REQUIREMENT	*****	*****	*****	*****	23 MO AVG	47 DAILY MX	ug/L		Monthly	GRAB
Silver total recoverable 01079 P 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	23 MO AVG	47 DAILY MX	ug/L		Quarterly	CALCTD
Silver total recoverable 01079 Q 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	23 MO AVG	47 DAILY MX	ug/L		Weekly	GRAB
Zinc, total recoverable 01094 1 0 Effluent Gross	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.03	0.03	mg/L	0	Monthly	GRAB
	PERMIT REQUIREMENT	*****	*****	*****	*****	0.9 MO AVG	1.9 DAILY MX	mg/L		Monthly	GRAB
Zinc, total recoverable 01094 P 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	0.9 MO AVG	1.9 DAILY MX	mg/L		Monthly	GRAB
Zinc, total recoverable 01094 Q 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	0.9 MO AVG	1.9 DAILY MX	mg/L		Quarterly	GRAB

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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

P=MONT. REDUCE (II.G.6.a.1)  
Q=MONT INCREASE (II.G.6.a.2)  
R=ACCELERATED TESTING (III.A.7)

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		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Copper, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	4	4	ug/L	0	Monthly	GRAB
01119 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	47	117	ug/L		Monthly	GRAB
Effluent Gross						MO AVG	DAILY MX				
Copper, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
01119 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	47	117	ug/L		Quarterly	GRAB
See Comments						MO AVG	DAILY MX				
Copper, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
01119 Q 0	PERMIT REQUIREMENT	*****	*****	*****	*****	47	117	ug/L		Weekly	GRAB
See Comments						MO AVG	DAILY MX				
Manganese, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	2	2	mg/L	0	Monthly	GRAB
11123 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	25	50	mg/L		Monthly	GRAB
Effluent Gross						MO AVG	DAILY MX				
Manganese, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
11123 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	25	50	mg/L		Quarterly	GRAB
See Comments						MO AVG	DAILY MX				
Manganese, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
11123 Q 0	PERMIT REQUIREMENT	*****	*****	*****	*****	25	50	mg/L		Weekly	GRAB
See Comments						MO AVG	DAILY MX				
Total Aromatic Hydrocarbons	SAMPLE MEASUREMENT	*****	*****	*****	*****	11	11	mg/L	0	Monthly	GRAB
39942 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	18	27	mg/L		Monthly	GRAB
Effluent Gross						MO AVG	DAILY MX				

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		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Total Aromatic Hydrocarbons	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
39942 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	18 MO AVG	27 DAILY MX	mg/L		Quarterly	GRAB
See Comments											
Total Aromatic Hydrocarbons	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
39942 Q 0	PERMIT REQUIREMENT	*****	*****	*****	*****	18 MO AVG	27 DAILY MX	mg/L		Weekly	GRAB
See Comments											
Total Aqueous Hydrocarbons	SAMPLE MEASUREMENT	*****	*****	*****	*****	11	11	mg/L	0	Monthly	GRAB
50259 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Monthly	GRAB
Effluent Gross											
Total Aqueous Hydrocarbons	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
50259 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Quarterly	GRAB
Effluent Gross											
Total Aqueous Hydrocarbons	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
50259 Q 0	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Weekly	GRAB
Effluent Gross											
Mercury, total (as Hg)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.2	0.2	ug/L	0	Monthly	GRAB
71900 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	0.6 MO AVG	1.0 DAILY MX	ug/L		Monthly	GRAB
Effluent Gross											
Mercury, total (as Hg)	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
71900 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	0.6 MO AVG	1.0 DAILY MX	ug/L		Quarterly	GRAB
See Comments											

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<b>PERMIT NUMBER</b>	<b>DISCHARGE NUMBER</b>

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		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Mercury, total (as Hg)	<b>SAMPLE MEASUREMENT</b>	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
71900 Q 0	<b>PERMIT REQUIREMENT</b>	*****	*****	*****	*****	0.6 MO AVG	1.0 DAILY MX	ug/L		Weekly	GRAB
See Comments											
Toxicity, Chronic**** Dendraster excentricus	<b>SAMPLE MEASUREMENT</b>	*****	*****	*****	*****	No Sample	No Sample	NA	NA	NA	NA
TT000 1 0	<b>PERMIT REQUIREMENT</b>	*****	*****	*****	*****	283 MO AVG**	568 DAILY MX**	toxic		See Permit	GRAB
See Comments***											
Toxicity, Chronic**** Menidia beryllina	<b>SAMPLE MEASUREMENT</b>	*****	*****	*****	*****	No Sample	No Sample	NA	NA	NA	NA
TT000 1 0	<b>PERMIT REQUIREMENT</b>	*****	*****	*****	*****	283 MO AVG**	568 DAILY MX**	toxic		See Permit	GRAB
See Comments***											
Toxicity, Chronic**** Mytilus galloprovincialis	<b>SAMPLE MEASUREMENT</b>	*****	*****	*****	*****	No Sample	No Sample	NA	NA	NA	NA
TT000 1 0	<b>PERMIT REQUIREMENT</b>	*****	*****	*****	*****	283 MO AVG**	568 DAILY MX**	toxic		See Permit	GRAB
See Comments***											
Toxicity, Chronic	<b>SAMPLE MEASUREMENT</b>	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
TT000 R 0	<b>PERMIT REQUIREMENT</b>	*****	*****	*****	*****	283 MO AVG	568 DAILY MX	toxic		See Permit	GRAB
See Comments											
Toxicity, Chronic	<b>SAMPLE MEASUREMENT</b>	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
TT000 Q 0	<b>PERMIT REQUIREMENT</b>	*****	*****	*****	*****	283 MO AVG	568 DAILY MX	toxic		See Permit	GRAB
Effluent Gross											

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\*\*Section II.F.4 of the permit.

\*\*\*Reduced monitoring to two times per year due to compliance as per II.G.6.a.1 of Permit.

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Q=MONT INCREASE (II.G.6.a.2.)  
R=ACCELERATED TESTING (III.A.7)

\*\*\*\*Annual three species WET testing was conducted at the end of April and beginning of May 2011. Results were reported on the May 2011 DMR. Semiannual single species WET testing was conducted in August 2011 and results were reported on the August 2011 DMR.